

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.
Zulma MARTINEZ

Defendant(s)


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Case No.

DR: 20-0826m-01

FILED

MAR 05 2020

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY 

DEPUTY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 3, 2020 in the county of Maverick in the
Western District of Texas, the defendant(s) violated:

Code Section

Title 21 USC 841, Title 21 USC 846

Offense Description

Knowingly or intentionally possess with intent to distribute a quantity of
Methamphetamine, a Schedule II Controlled Substance, as well as attempt or
conspire to commit such offense, the commission of which was the object of the
attempt or conspiracy.

This criminal complaint is based on these facts:

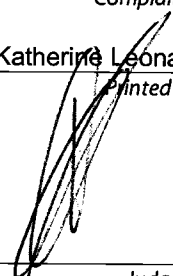
See Attachment A.

☐ Continued on the attached sheet.

Complainant's signature

Katherine Leonard, HSI Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: March 5, 2020City and state: Del Rio, Texas

Judge's signature

United States Magistrate Judge
Printed name and title**Victor Roberto Garcia**
U.S. Magistrate Judge

ATTACHMENT A

On March 3, 2020, Zulma MARTINEZ, a United States (US) citizen, entered the US from the Republic of Mexico via the Eagle Pass, Texas Port of Entry (POE) #1. MARTINEZ was the sole occupant and driver of a gray 2017 Dodge Neon bearing Mexican License Plate: FNV6895. A US Customs and Border Protection Officer (CBPO) assigned to the primary inspection area received a negative declaration from MARTINEZ and referred her to the secondary inspection area. In the secondary inspection area, a CBPO received a second negative declaration from MARTINEZ. During a subsequent seven-point inspection, CBPOs noticed several packages concealed within the rear quarter panels of the vehicle. A CBP-K9 Officer then ran a K-9 inspection on the vehicle which led to a positive alert for the presence of narcotics. The vehicle was then referred for a non-intrusive inspection utilizing the Z-Portal machine which led to the discovery of 13 bricks that tested positive for the properties of Methamphetamine, a Schedule II Controlled Substance. The total weight of the packages and substance was approximately 6.5 kilograms. A non-factory GPS tracker was also discovered installed inside the vehicle.

Homeland Security Investigations (HSI) Special Agents (SAs) responded and advised MARTINEZ of her Miranda Rights, which she waived, indicating she was willing to answer questions without an attorney present. MARTINEZ stated she received the vehicle from a friend in Piedras Negras, Mexico known as "Juan" who instructed her to drive the vehicle to San Antonio, TX where she was to meet with an unknown third party who would conceal \$50,000 US Dollars (USD) in the vehicle. MARTINEZ stated she was instructed to then drive the vehicle to Mexico and return it to "Juan" in exchange for \$3,000 USD. MARTINEZ stated she assumed the \$50,000 USD were narcotics proceeds because she had overheard multiple phone conversations where "Juan" was discussing large sums of money as well as the transportation of narcotics. MARTINEZ provided HSI SAs with verbal and written consent to search her phone which revealed that she was sharing her current location with "Juan" who was in Mexico.